

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE**

MICHAEL NINIVAGGI, JAKE MICKEY,
CAILIN NIGRELLI, and HANNAH RUSSO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UNIVERSITY OF DELAWARE,

Defendant.

Civil Action No. 20-cv-1478-SB

**NOTICE OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that upon: (1) the accompanying Memorandum of Law, (2) the Declaration of Joshua D. Arisohn and the exhibits attached thereto (including the Parties' Class Action Settlement Agreement), and (3) the Declaration of Amanda Sternberg and the exhibits attached thereto, Plaintiffs Michael Ninivaggi, Jake Mickey, Cailin Nigrelli, Hannah Russo, and Sean Griffin, through their undersigned attorneys, will move this Court, before the Honorable Stephanos Bibas, United States Circuit Court Judge, at the J. Caleb Boggs Federal Building and United States Courthouse, 844 North King Street, Wilmington, Delaware, for an Order, pursuant to Federal Rule of Civil Procedure 23: (i) granting final approval of the Class Action Settlement; (ii) finally certifying the Settlement Class; (iii) finding that the Notice Plan comports with due process and with Rule 23 of the Federal Rules of Civil Procedure; and (iv) granting such other, further, or different relief as the court deems just and proper.

* * *

A Proposed Final Judgment and Order is submitted herewith.

Dated: October 9, 2023

Respectfully submitted,

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